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March 30, 2023

VIA ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Carroll v. Trump*, 22 Civ. 10016 (LAK)

Dear Judge Kaplan:

On behalf of Plaintiff E. Jean Carroll and in accordance with the Court's Pretrial and Scheduling Order, ECF 19, we submit our proposed: (1) jury instructions; (2) special verdict form; and (3) *voir dire* examination. *See* Exs. A–C.

Because the Court's Pretrial and Scheduling Order contemplated the submission of these documents jointly, ECF 19 at 4, we shared our drafts of these filings with counsel for Defendant yesterday. Defendant has not shared any drafts of his own. Earlier today, Defendant's lawyers told us that they would not be in a position to give us comments before filing so we are filing the attached documents on behalf of Plaintiff only.

Respectfully submitted,



Roberta A. Kaplan

cc: Counsel of Record